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August 21, 2020

VIA ECF

The Honorable Lewis A. Kaplan
U.S. District Judge
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007

Memo Endorsed

Granted for reasons stated in Dkt
24

Re: PRCM Advisers LLC v. Two Harbors Investment Corp., Case No. 1:20-cv-05649-LAK -
Motion to Redact

8/15/2020

Dear Judge Kaplan:

We represent Defendant Two Harbors Investment Corp. ("Two Harbors") in the above-referenced matter. Two Harbors submits this letter motion respectfully to request approval to redact portions of the Memorandum of Law in Support of Defendant Two Harbors Investment Corp.'s Motion to Dismiss the Complaint (the "Motion to Dismiss") and portions of Exhibits A, G, and H to the Declaration of Ezekiel L. Hill in Support of Defendant Two Harbors Investment Corp.'s Motion to Dismiss the Complaint (the "Motion to Dismiss Declaration").

Exhibit A to the Motion to Dismiss Declaration is the complaint (the "Complaint") previously filed in this matter by Plaintiff PRCM Advisers LLC ("PRCM"). The Court previously ordered the Complaint to be "temporarily filed under seal in the Court's electronic case file in connection with this matter, at least until such time as [Two Harbors] enters an appearance" and, within one week thereof, "the parties . . . file a joint letter stating which, if any redactions, to the Complaint they believe are necessary." (Dkt. No. 8.) Consistent with that order, PRCM publicly filed a redacted version of the Complaint. (See Dkt. No. 9.) Exhibit A to the Motion to Dismiss Declaration is that redacted version of the Complaint. An unredacted version of Exhibit A, with redactions highlighted, is Exhibit 1 to the Declaration of Ezekiel L. Hill in Support of Defendant Two Harbors Investment Corp.'s Letter Motion to Redact (the "Motion to Redact Declaration"), filed herewith.¹

Exhibit G to the Motion to Dismiss Declaration is a letter dated April 10, 2020, from Stephen Kasnet of Two Harbors to Brian Taylor of Pine River Capital Management L.P. Two Harbors seeks approval to redact portions of Exhibit G because PRCM (and only PRCM) has requested it. Two Harbors has publicly filed a redacted version of Exhibit G. An unredacted version of Exhibit G, with redactions highlighted, is Exhibit 2 to the Motion to Redact Declaration.

¹ A redacted version of the Motion to Redact Declaration has been filed publicly to safeguard the information that Two Harbors seeks approval to redact.